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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WELLS FARGO FINANCIAL NEVADA 2,
INC., a Nevada corporation,

Plaintiff,

vs.

EDDIE HADDAD, an individual; DESERT
INN MOBILE FAMILY ESTATES OWNERS
ASSOCIATION; a Nevada non-profit
corporation; VIAL FOTHERINGHAM LLP,
an Oregon limited-liability partnership;

Defendants.

Case No. 2:17-cv-01511-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

Plaintiff Wells Fargo Financial Nevada 2, Inc. (“Wells Fargo”) and Eddie Haddad (“Haddad”), by and through their respective counsel (collectively the “Parties”), for good cause shown, hereby stipulate and agree to extend the discovery cut-off deadline in this action by 30 days to allow the Parties to reschedule and conduct depositions due to the Parties’ scheduling constraints. This request complies with Local Rule (“LR”) 6-1, 6-3, 7-1, and 26-4, and is based on good cause because the litigation of this matter will be best served by the proposed extension. This is the Parties’ first extension request.

I. GOOD CAUSE FOR EXTENSION TO COMPLETE DISCOVERY

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1, there exists good cause to grant this extension to respond for the following reasons:

1. On May 21, 2018, Wells Fargo served deposition notices on Haddad and non-party the Desert Inn Mobile Family Estates Owners Association (the “HOA”) for depositions to occur on June 6 and June 15, 2018, respectively.

2. Haddad’s counsel advised Wells Fargo’s counsel that Haddad was unavailable on June 6, 2018, but has not yet provided alternative availability.

3. Additionally, on June 8, 2018, the HOA’s counsel advised Wells Fargo’s counsel that the HOA’s Rule 30(b)(6) witness was unavailable for a deposition on June 15.

4. Wells Fargo’s counsel and the HOA’s counsel are working to rescheduled the HOA’s Rule 30(b)(6) deposition to a mutually agreeable time.

5. Due to the parties’ and their counsels’ availability, the parties are unable to conduct Haddad’s deposition or the HOA’s deposition before the current discovery deadline of June 19, 2018.

6. Therefore, good cause exists to extend the discovery cut-off deadline by 30 days, to July 19, 2018, for Wells Fargo to conduct Haddad’s and the HOA’s respective depositions.

II. DISCOVERY COMPLETED TO DATE

To date the Parties have completed the following discovery:

- Wells Fargo made its initial FRCP 26(a)(1) disclosure on May 7, 2017.
- Haddad made his initial FRCP 26(a)(1) disclosure on January 22, 2018.
- Wells Fargo made its initial expert disclosure on March 19, 2018.
- Haddad served his first set of Interrogatories, Requests for Production of Documents, and Requests for Admission on Wells Fargo on March 19, 2018.
 - Wells Fargo responded to Haddad’s requests on May 7, 2018.
- Wells Fargo served its first set of Interrogatories, Requests for Production of Documents, and Requests for Admission on Haddad on May 17, 2018.
 - Haddad’s responses are currently due June 19, 2018.

1 • Haddad served his second set of Interrogatories, and Requests for Admission on
2 Wells Fargo on May 21, 2018.

3 o Wells Fargo's responses are currently due June 25, 2018.

4 **III. DISCOVERY TO BE COMPLETED**

5 The parties anticipate that the following discovery still needs to be completed:

- 6 • Deposition of the HOA's corporate representative.
- 7 • Deposition of Haddad.

8 **IV. PROPOSED NEW DEADLINES**

9 **Discovery cut-off deadline:**

10 Currently: June 19, 2018

11 Proposed: **July 19, 2018.**

12 **Dispositive motions:**

13 Currently: July 19, 2018

14 Proposed: **August 17, 2018.**

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V. CONCLUSION

For the foregoing reasons, the Parties respectfully request that the Court grant their request to continue the discovery deadlines detailed herein by thirty (30) days.

Dated: June 12, 2018

Dated: June 12, 2018

SNELL & WILMER L.L.P.

LAW OFFICES OF MICHAEL S. BOHN,
ESQ., LTD.

By: /s/ Michael Paretti

By: /s/ Michael F. Bohn

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*Attorneys for Plaintiff Wells Fargo
Financial Nevada 2, Inc.*

ORDER

IT IS ORDERED.

DATED this 13 day of June 2018.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u> X </u>	Electronic Filing

and addressed to the following:

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Attorneys for Defendant Eddie Haddad

DATED June 12, 2018

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

4829-1084-6313